IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

THE TRUSTEES OF THE UNIVERSITY OF
PENNSYLVANIA,

    Plaintiff,

    v.

ELI LILLY AND COMPANY,
IMCLONE LLC, and
BRISTOL-MYERS SQUIBB COMPANY,

    Defendants.

Civil Action No. 2:15-cv-06133-WB

JOINT MOTION FOR ENTRY OF
ORDER GOVERNING ELECTRONIC DISCOVERY

Plaintiff Trustees of the University of Pennsylvania and Defendants Eli Lilly and

Company, ImClone LLC, and Bristol-Myers Squibb Company hereby jointly move for entry of

an Order Governing Electronic Discovery. The parties have met and conferred to discuss how to

conduct electronic discovery in this case, as required by the Court's Notice of Preliminary

Pretrial Conference (D.I. 18) and Draft Order Governing Electronic Discovery (D.I. 18-1). The

parties have agreed to the protocols described in the attached Proposed Order, subject to the

approval of the Court.

Dated: January 29, 2016

Respectfully submitted.

/s/ Andrew A. Chirls

Andrew A. Chirls (No. 35422)
Fineman Krekstein & Harris, P.C.
1801 Market Street, Suite 1100
Philadelphia, PA 19103

Jonathan G. Graves
jgraves@cooley.com
Cooley LLP
One Freedom Square
Reston Town Center
11951 Freedom Drive
Reston, VA 20190
(703) 456-8000

DeAnna Allen
dallen@cooley.com
Cooley LLP
1299 Pennsylvania Ave, NW
Suite 700
Washington, DC 20004
(202) 842-7896

Susan Krumplitsch
skrumplitsch@cooley.com
Cooley LLP
3175 Hanover Street
Palo Alto, CA 94304
(650) 843-5000

*Attorneys for Plaintiff The Trustees of the
University of Pennsylvania*

/s/ Nicole D. Galli

Nicole D. Galli (PA SB #78420)
ndgalli@ndgallilaw.com
Law Offices of N.D. Galli LLC
2 Penn Center Plaza, Suite 910
1500 JFK Blvd.
Philadelphia, PA 19102
Telephone: 215-525-9580
Facsimile: 215-525-9585

George F. Pappas (*pro hac vice*)
gpappas@cov.com
Matthew Kudzin (*pro hac vice*)
mkudzin@cov.com
COVINGTON & BURLING LLP
850 Tenth Street, NW
Washington, DC 20001-4956
Telephone: 202-662-6000
Facsimile: 202-662-6291

*Attorneys for Defendants Eli Lilly and
Company, ImClone LLC, and Bristol-Myers
Squibb Company*